

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

Abdi Nazemian, et al.,  
Plaintiffs,  
vs.

NVIDIA Corporation,  
Defendant.

Andre Dubus III, et al.,  
Plaintiffs,  
vs.

NVIDIA Corporation,  
Defendant.

Case No. 4:24-cv-01454-JST (SK)  
Case No. 4:24-cv-02655-JST (SK)

**JOINT STIPULATION AND [PROPOSED]  
ORDER RE DEPOSITION PROTOCOL  
SUBMISSION DEADLINE**

1 Pursuant to Civil Local Rule 7-12, the undersigned Parties to the above-captioned action, by and  
2 through their respective counsel of record, hereby stipulate the following:

3 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar  
4 for an Initial Case Management Conference, (Case No. 4:24-cv-01454-JST (SK) ("*Nazemian*"), ECF No.  
5 66; Case No. 4:24-cv-02655-JST (SK) ("*Dubus*"), ECF No. 56), and the Court ordered the Parties to meet  
6 and confer on a proposed case schedule (*Nazemian*, ECF No. 68; *Dubus*, ECF No. 57);

7 2. WHEREAS, on September 9, 2024 in the *Nazemian* case and on September 10, 2024 in  
8 the *Dubus* case the Parties submitted a stipulated case schedule, which included March 25, 2025 as the  
9 deadline by which the parties must submit an agreed upon Deposition Protocol or a joint letter brief  
10 regarding any disputed areas (*Nazemian*, ECF No. 70; *Dubus*, ECF No. 58);

11 3. WHEREAS, on September 11, 2024, the Court ordered the parties' stipulated case  
12 schedule, including the Deposition Protocol submission deadline (*Nazemian*, ECF No. 71; *Dubus*, ECF  
13 No. 59);

14 4. WHEREAS, on March 6 and 12, 2025, additional counsel joined the case for Plaintiffs  
15 (*Nazemian*, ECF Nos. 106-122, 124-26);

16 5. WHEREAS, the Parties believe that an extension of the Deposition Protocol deadline is  
17 needed so they can make progress toward a stipulated protocol; and

18 6. WHEREAS, the requested extension will not affect any other date scheduled in this case;

19 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties  
20 and their respective counsel, subject to the Court's approval, that the Parties' deadline to submit an  
21 agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, shall be extended  
22 from March 25, 2025 to April 24, 2025.

1 Dated: March 21, 2025

Respectfully submitted,

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**[PROPOSED] ORDER**

Pursuant to the stipulation of the Parties, it is hereby ORDERED that the Parties' deadline for filing an agreed upon Deposition Protocol, or filing a joint letter brief with the Parties' respective proposals shall be continued to April 24, 2025.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Sallie Kim  
U.S. Magistrate Judge



**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: March 21, 2025

/s/ Sean S. Pak  
Sean S. Pak